

EXHIBIT 8

From: Wayne M. Helge <whelge@davidsonberquist.com>
Sent: Wednesday, January 27, 2021 3:56 PM
To: Specht, Claire; Worlds Activision DBJG; MTRIBBLE@SusmanGodfrey.com; rcaughey@susmangodfrey.com; clangham@SusmanGodfrey.com; jleeman@sunsteinlaw.com
Cc: WH Activision Blizzard Worlds Service
Subject: RE: Worlds, Inc. v. Activision Blizzard Inc. (D. Mass.) - Elliot Deposition
Categories: Activision/Worlds

EXTERNAL SENDER

Claire,

Worlds will take Mr. Elliot's deposition on Feb. 4th.

Thank you,

Wayne

Wayne Helge, Esq.
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From: Specht, Claire <Claire.Specht@wilmerhale.com>
Sent: Wednesday, January 27, 2021 1:12 PM
To: Wayne M. Helge <whelge@davidsonberquist.com>; Worlds Activision DBJG <worlds-activision@dbjg.com>; MTRIBBLE@SusmanGodfrey.com; rcaughey@susmangodfrey.com; clangham@SusmanGodfrey.com; jleeman@sunsteinlaw.com
Cc: WH Activision Blizzard Worlds Service <WHActivisionBlizzardWorldsService@wilmerhale.com>
Subject: RE: Worlds, Inc. v. Activision Blizzard Inc. (D. Mass.) - Elliot Deposition

EXTERNAL EMAIL

Wayne,

As noted below, Defendants have provided a supplemental response to Interrogatory No. 2, identifying Mr. Cash as a person knowledgeable about World of Warcraft; Worlds has already deposed Mr. Cash.

Defendants reiterate that given that Mr. Elliot has not worked on the World of Warcraft franchise for a number of years, his memory as to World of Warcraft at this time is limited, and we suggest that Worlds not put the parties and witness through the burden and expense of taking his deposition.

Please confirm by close of business today (1/27) that Worlds does not intend to depose Mr. Elliot. If Worlds insists on proceeding, please articulate what information Worlds seeks from Mr. Elliot that is noncumulative of the testimony provided by Mr. Cash. Please also note that if Worlds insists on proceeding, Mr. Elliot's deposition will need to take place on February 4.

Regards,
Claire

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From: Specht, Claire
Sent: Wednesday, January 20, 2021 8:21 PM
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Cc: WH Activision Blizzard Worlds Service <WHActivisionBlizzardWorldsService@wilmerhale.com>
Subject: RE: Worlds, Inc. v. Activision Blizzard Inc. (D. Mass.) - Elliot Deposition

Wayne,

Defendants served a supplemental response to Interrogatory No. 2, further identifying George John Cash, IV, as a person knowledgeable concerning technical topics for World of Warcraft. Worlds deposed Mr. Cash on November 5, 2015 in his personal and 30(b)(6) capacity.

Regards,
Claire

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From: Wayne M. Helge <whelge@davidsonberquist.com>
Sent: Tuesday, January 19, 2021 11:13 PM
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Cc: WH Activision Blizzard Worlds Service <WHActivisionBlizzardWorldsService@wilmerhale.com>
Subject: RE: Worlds, Inc. v. Activision Blizzard Inc. (D. Mass.) - Elliot Deposition

EXTERNAL SENDER

Claire,

Per below, please confirm by January 21, 2021 whether Mr. Elliot remains Defendants' identified person most knowledgeable regarding World of Warcraft's technical topics, as Defendants represented in their recent supplement to Worlds' Interrogatory No. 2.

Best,

Wayne

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From: Wayne M. Helge
Sent: Thursday, January 14, 2021 9:07 PM
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Subject: RE: Worlds, Inc. v. Activision Blizzard Inc. (D. Mass.) - Elliot Deposition

Claire,

Worlds' Rog 2 asked Defendants to identify PMKs for certain topics. On October 16, 2020, Defendants confirmed their earlier response by identifying Mike Elliot as this person for World of Warcraft's technical topics. Will Defendants be modifying their response to Worlds' Rog No. 2?

Thanks,
Wayne

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From: Specht, Claire <Claire.Specht@wilmerhale.com>
Sent: Wednesday, January 13, 2021 4:52 PM
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Cc: WH Activision Blizzard Worlds Service <WHActivisionBlizzardWorldsService@wilmerhale.com>

Subject: Worlds, Inc. v. Activision Blizzard Inc. (D. Mass.) - Elliot Deposition

EXTERNAL EMAIL

Counsel,

I write regarding Worlds' 30(b)(1) deposition notice to Mike Elliot. As we explained during the parties' meet and confer on December 15, Mr. Elliot has not worked on World of Warcraft for 8 years. Accordingly, his memory as to World of Warcraft at this time is limited, and we suggest that Worlds not put the parties and witness through the burden and expense of a deposition. If Worlds agrees to forego Mr. Elliot's deposition, Defendants agree not to call Mr. Elliot as a witness at trial.

Please let us know Worlds' position by Friday, January 15.

Regards,
Claire

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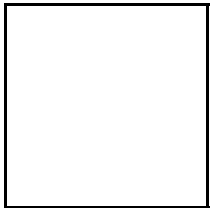
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DAVIDSON, BERQUIST, JACKSON & GOWDEY LLP

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